



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 8

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Ref: 8EPR-N

JAN 29 2016

Mr. David Vela, Superintendent  
Grand Teton National Park  
U.S. Department of the Interior  
National Park Service  
PO Box 170  
Moose, Wyoming 83012

RE: Moose-Wilson Corridor Draft Comprehensive Management Plan/Environmental Impact  
Statement: CEQ# 20150302

Dear Superintendent Vela:

The U.S. Environmental Protection Agency Region 8 has reviewed the Draft Environmental Impact Statement (EIS) for the Moose-Wilson Corridor – Draft Comprehensive Management Plan, developed by the National Park Service (NPS), Grand Teton National Park. In accordance with our responsibilities under Section 102(2)(C) of the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, the EPA has reviewed and rated this Draft EIS.

**Project Background**

The planning area comprises approximately 10,300 acres in the southwest corner of the Grand Teton National Park in Teton County, north of Jackson, Wyoming. The project identifies the need to establish a comprehensive management plan for the existing 7.1 miles of the Moose-Wilson Road within the park boundaries and the surrounding corridor. Moose-Wilson Road is increasingly being utilized by visitors and local commuters, and with the transfer of private to public ownership of the Laurance S. Rockefeller Preserve, the NPS is anticipating future increases in the use of this once-seldom utilized portion of the Park. Increased usage of this area by grizzly bears and other wildlife and their interactions with visitors are also drivers for the need of the management plan.

**Alternatives**

The Draft EIS analyzes a no action alternative (Alternative A), as well as three other action alternatives (Alternatives B, C, and D). The NPS has identified Alternative C as its preferred alternative. Alternative C proposes the following:

1. the addition of car queuing lanes at the entrance stations to limit the amount of vehicle traffic and avoid potential congestion within the corridor;
2. paving the existing unpaved section of the Moose Wilson Road;
3. the addition of turnouts to deter use of visitor-made turnouts;

4. the addition of an 80-90 car parking lot for the Death Canyon trailhead to avoid impacts from visitor-made parking;
5. removing a portion of Death Canyon Road and converting it to part of the existing trail;
6. realignment of the northeast section of the road to restore the beneficial wetland hydrology; and
7. removing the existing northeast portion of the Moose-Wilson Road and restoring it with native vegetation.

Alternatives B and D are similar to C, except that they both propose additional realignments of the existing road (beyond the northeast section) to remove it from wetlands that it currently transverses. This realignment appears optimal; however, the proposed relocation of the road would impact important cultural and archaeological resources. Alternatives B and D also propose to leave the unpaved portion of Moose-Wilson Road unpaved, which the Draft EIS indicates may result in increased impacts from road erosion and dust abatement activities. Alternative D also proposes to add a multiuse pathway along the road for cyclists and pedestrian traffic in addition to scenic overlooks.

### **Recommendations for consideration**

The EPA recommends that in the Final EIS, the NPS expand upon the exact best management practices (BMPs) that will be utilized for this project, specifically those that relate to erosion, sedimentation and the protection of aquatic resources. The EPA acknowledges that the NPS identifies a number of BMPs and areas where BMPs are necessary; however, the Draft EIS frequently states that BMPs will be developed and implemented without providing specific detail. We also recommend that the Final EIS identify mitigation measures as they relate to parts of the project where new paving or construction will occur. As recommended in our September 15, 2014 letter, design features should be considered to avoid or mitigate concentrated runoff flows that can arise from new construction and paving. While the Draft EIS states that the NPS will make efforts to avoid such issues, the document does not provide detail about how this will be accomplished. Providing greater detail on these facets of the project will enhance the understanding of how aquatic resources and wetlands will be protected.

### **Climate Change**

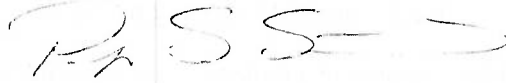
The EPA acknowledges the proactive approach of the NPS' Climate Change Response Program in its efforts to aid parks in coping with the uncertainty of future climate conditions. The NPS' Climate Change Response Program provides strategies of Science, Mitigation, Adaptation, and Communication that will allow the park to address climate change throughout implementation of this comprehensive management plan.

### **Conclusion and rating**

The EPA agrees that the NPS preferred alternative (Alternative C) provides the best balance between environmental and cultural/historical impacts. Pursuant to EPA policy and guidance, the EPA rates the environmental impact of an action and the adequacy of the NEPA analysis. The EPA has rated the preferred alternative as "LO" (Lack of Objections). This "LO" rating means that the review has not identified any potential environmental impacts requiring substantive changes to the preferred alternative. A full description of the EPA's rating system can be found at: <http://www2.epa.gov/nepa/environmental-impact-statement-rating-system-criteria>.

We appreciate the opportunity to review this project and hope are recommendations help the NPS when finalizing the EIS. If you have any questions or would like to discuss our comments, please contact me at (303) 312-6704 or Matt Hubner of my staff at (303) 312-6500 or Hubner.matt@epa.gov.

Sincerely,



Philip S. Strobel  
Director, NEPA Program  
Office of Ecosystems Protection and Remediation

Enclosure

cc: Mr. Chris Church, National Park Service  
Mr. Daniel Noon, National Park Service, Grand Teton National Park



## **U.S. Environmental Protection Agency Rating System for Draft Environmental Impact Statements**

### **Definitions and Follow-Up Action\***

#### **Environmental Impact of the Action**

**LO - - Lack of Objections:** The Environmental Protection Agency (EPA) review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

**EC - - Environmental Concerns:** The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts.

**EO - - Environmental Objections:** The EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

**EU - - Environmentally Unsatisfactory:** The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

#### **Adequacy of the Impact Statement**

**Category 1 - - Adequate:** EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis of data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

**Category 2 - - Insufficient Information:** The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new, reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses or discussion should be included in the final EIS.

**Category 3 - - Inadequate:** EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the National Environmental Policy Act and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

\* From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment. February, 1987.